

EXHIBIT A

This form is affected by the Privacy Act of 1974: See Privacy Act Statement
Before completing this form.

☒ IDHR

☒ EEOC

CHARGE NUMBER

Illinois Department of Human Rights and EEOC

NAME OF COMPLAINT (Indicate Mr. Ms. Mrs.)

Ms. Angel Turner

TELEPHONE NUMBER (include area code)

(773) 450-3391

STREET ADDRESS

3206 Mallard Drive

CITY, STATE, ZIP CODE

Homewood, Illinois 60430

DATE OF BIRTH

NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL
GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE, LIST BELOW)

NAME OF RESPONDENT

Chicago Public Schools/Board of Education/Office of Inspector General

NUMBER OF
EMPLOYEES,
MEMBERS +15

TELEPHONE NUMBER (include area code)

(773) 553-1000

STREET ADDRESS

42 West Madison Street

CITY, STATE, ZIP CODE

Chicago, Illinois 60602

COUNTY

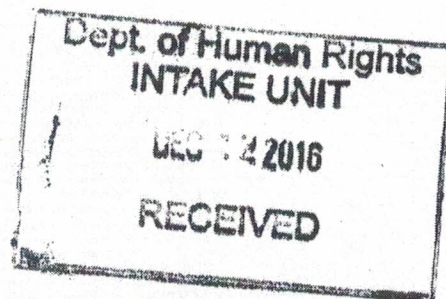
Cook

CAUSE OF DISCRIMINATION BASED ON:

Race discrimination

DATE OF DISCRIMINATION
EARLIEST (ADEA/EPA) LATEST (ALL)
☒ CONTINUING ACTION

S E E A T T A C H E D



Page 1 of 2

I also want this charge filed with the EEOC. I will advise the agencies if
I change my address or telephone number and I will cooperate fully with
them in the processing of my charge in accordance with their procedures.

SUBSCRIBED AND SWORN TO BEFORE ME

THIS 7th DAY OF December, 2016.

Jennifer Stephens
NOTARY SIGNATURE



NOTARY STAMP

X Angel L. Jones
SIGNATURE OF COMPLAINANT

12/7/16
DATE

I declare under penalty that the foregoing is true and correct I swear or
affirm that I have read the above charge and that is is true to the best of my
knowledge, information and belief

Ms. Angel Turner
Charge of Discrimination
Page 2 of 2

I. A. ISSUE/BASIS

Discrimination – May 2016 and ongoing because of my race.

B. PRIMA FACIE ALLEGATIONS

1. I am Black.
2. I am employed by the Academy for Urban School Leadership as a Director of School Leadership.
3. One of the Chicago Public Schools (“CPS”) that I was assigned to oversee was Orr Academy High School, a school primarily attended by Black students.
4. In or about May 2016, I was contacted by the CPS Office of the Inspector General (“OIG”) regarding the student attendance records that were reported at Orr Academy. The OIG also contacted my current employer regarding the allegations.
5. On October 6, 2016, the CPS OIG issued a report falsely accusing me of being “negligent in [my] supervision of the administration at [Orr Academy].” CPS then placed a Do Not Hire (“DNH”) on my record.
6. CPS and the OIG did not similarly target non-Black administrators or primarily non-Black schools in their investigations.
7. I was not negligent in my supervision of the administration at Orr Academy. I explained in detail to CPS and the OIG that I followed the proper procedures at the schools I supervised. My work performance was as good, if not better, than non-Black supervisor/administrators of Respondent.
8. I have suffered pecuniary loss and extreme emotional distress as a result of Respondent’s discriminatory treatment of me.

EXHIBIT B



U.S. Department of Justice
Civil Rights Division

NOTICE OF RIGHT TO SUE WITHIN 90 DAYS

CERTIFIED MAIL

7014 3490 0000 6312 2376

950 Pennsylvania Avenue, N.W.
Karen Ferguson, EMP, PHB, Room 4701
Washington, DC 20530

June 16, 2017

Ms. Angel Turner
c/o Barry A. Gomberg, Esquire
Law Offices of Barry A. Gomberg & Assocs.
53 W. Jackson Blvd.
Suite 1350
Chicago, IL 60604

Re: EEOC Charge Against Chicago Public Schools, Chicago Board of Education, et al.
No. 21B201700620

Dear Ms. Turner:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

The investigative file pertaining to your case is located in the EEOC Chicago District Office, Chicago, IL.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

T. E. Wheeler, II
Acting Assistant Attorney General
Civil Rights Division

by

Karen L. Ferguson
Supervisory Civil Rights Analyst
Employment Litigation Section

cc: Chicago District Office, EEOC

Chicago Public Schools, Chicago Board of Education, et al.

EXHIBIT C



Office of Employee Engagement
42 West Madison Street, 9th Floor - Chicago, Illinois 60602

October 4, 2016

Angel Turner
[REDACTED]

Dear Ms. Turner:

Please be advised that pursuant to the applicable Chief Executive Officer's Guidelines regarding do not hire ("DNH") status, you are no longer eligible for hire in the Chicago Public Schools and a DNH has been placed on your file. You may petition the Chief Executive Officer to remove that designation. The request should be addressed to Mary Ernesti, 42 West Madison Street, 9th Floor, Chicago, Illinois 60602. Please note that while a petition may be made at any time after placement of the designation, only one petition every two years shall be considered. The Guidelines and procedures for removal of the DNH designation may be found here: cps.edu/oe.

Sincerely,

Mary Ernesti
Director of Employee Engagement

ME:cp

cc: James Ciesil
Employee Services

BOE000386

EXHIBIT D

July 11, 2017

**VIA FACSIMILE (312) 553-1622 &
U.S. MAIL**

Andrew Mason, CPS FOIA Officer
Department of Communications
42 W. Madison Street
2nd Floor
Chicago, IL 60602

Re: CPS OIG Freedom of Information Act Request

Dear Mr. Mason:

This is a request under the Freedom of Information Act.

I request that a copy of the following documents be provided to me:

All reports issued by the CPS Office of the Inspector General concerning Angel Turner's alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.


All documentary evidence that the CPS Office of the Inspector General reviewed and utilized in evaluating Angel Turner's alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.

All statements obtained by the CPS Office of the Inspector General in their review and evaluation of Angel Turner's alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.

I look forward to hearing from you regarding the foregoing. Thank you for your consideration of my request. If you are not the proper recipient of this FOIA Request, please advise us of the proper individual to whom this Request should be made.

Very truly yours,

BARRY A. GOMBERG & ASSOCIATES, LTD.


Barry A. Gomberg

BAG/lg

cc: Angel Turner

EXHIBIT E

From: Gomberg Barry <gomberglaw@aol.com>

To: gomberglaw1 <gomberglaw1@aol.com>

Subject: Fwd: Non-Commercial FOIA Request :: N003245-071917

Date: Thu, Jul 20, 2017 11:10 am

BARRY A. GOMBERG & ASSOCIATES, LTD.
53 W. Jackson Blvd. Suite 1350
Chicago, IL 60604
312 922-0550 Office
312 922-0066 Fax
gomberglaw@aol.com Email

-----Original Message-----

From: Chicago Public Schools FOIA Center <cps@mycusthelp.net>

To: gomberglaw <gomberglaw@aol.com>

Sent: Thu, Jul 20, 2017 11:09 am

Subject: Non-Commercial FOIA Request :: N003245-071917

--- Please respond above this line ---

July 20, 2017

Barry A. Gomberg
53 W Jackson
Chicago IL 60604
gomberglaw@aol.com

RE: Chicago Public Schools FOIA Request N003245-071917

Dear Mr. Gomberg:

This letter is in reply to your Freedom of Information Act (FOIA) request seeking the following information:

All reports issued by the CPS Office of the Inspector General concerning Angel Turner's alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.

All documentary evidence that the CPS Office of the Inspector General reviewed and utilized in evaluating Angel Turner's alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.

All statements obtained by the CPS Office of the Inspector General in their review and evaluation of Angel Turner's alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.

RESPONSE: Chicago Public Schools has reviewed your request and determined that the records requested are confidential or exempt from disclosure under the Freedom of Information Act. Pursuant to 5 ILCS 140/7.5(h), "any lawfully created State or local inspector general's office that would be exempt if created or obtained by an Executive Inspector General's office" is exempt from release. In the case of a denial, pursuant to 5 ILCS 140/9.5(a) you may file a Request for Review with the Public Access Counselor (PAC) at: Public Access Counselor; Office of the Attorney General; 500 South 2nd Street; Springfield, IL 62706. You also have the right to seek judicial review of your denial by filing a lawsuit in the State circuit court; 5 ILCS 140/11.


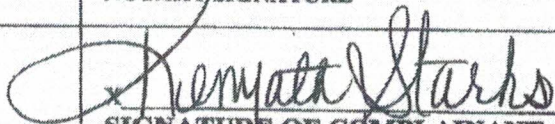
If you have any questions, please contact our office at (773) 553-3500.

Thank you for your request.

Sincerely,

Annie Righi
Freedom of Information Act Assistant
Chicago Public Schools

EXHIBIT F

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974: See Privacy Act Statement before completing this form. #		AGENCY <input checked="" type="checkbox"/> IDHR <input checked="" type="checkbox"/> EEOC	CHARGE NUMBER
Illinois Department of Human Rights and EEOC			
NAME OF COMPLAINT (Indicate Mr. Ms. Mrs.) Ms. Kenyatta Starks (aka Kenyatta Stansberry-Butler)		TELEPHONE NUMBER (include area code) (773) 294-5079	
STREET ADDRESS 7955 South Washtenaw	CITY, STATE, ZIP CODE Chicago, Illinois 60652		DATE OF BIRTH 05/01/1972
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE, LIST BELOW)			
NAME OF RESPONDENT Chicago Public Schools/Board of Education/Office of Inspector General		NUMBER OF EMPLOYEES, MEMBERS +15	TELEPHONE NUMBER (include area code) (773) 553-1000
STREET ADDRESS 42 West Madison Street	CITY, STATE, ZIP CODE Chicago, Illinois 60602		COUNTY Cook
CAUSE OF DISCRIMINATION BASED ON: Race discrimination		DATE OF DISCRIMINATION EARLIEST (ADEA/EPA) LATEST (ALL) <input checked="" type="checkbox"/> CONTINUING ACTION	
SEE ATTACHED			
<div style="float: right; border: 1px solid black; padding: 5px; text-align: center;"> DEPT. OF HUMAN RIGHTS INTAKE UNIT DEC 7 2016 RECEIVED </div>			
I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		SUBSCRIBED AND SWORN TO BEFORE ME THIS <u>7</u> DAY OF <u>Dec.</u> , <u>16</u>  NOTARY SIGNATURE	
<div style="border: 1px solid black; padding: 5px; text-align: center;"> OFFICIAL SEAL PHILLIP FISHER NOTARY PUBLIC - STATE OF ILLINOIS MY COMMISSION EXPIRES: 09/26/18 </div>		 SIGNATURE OF COMPLAINANT <u>12/1/16</u> DATE	
NOTARY STAMP		I declare under penalty that the foregoing is true and correct I swear or affirm that I have read the above charge and that is is true to the best of my knowledge, information and belief	

Ms. Kenyatta Starks (aka Kenyatta Stansberry-Butler)
Charge of Discrimination
Page 2 of 2

I. A. ISSUE/BASIS

Discrimination – May 2016 and ongoing because of my race.

B. PRIMA FACIE ALLEGATIONS

1. I am Black.
2. I am employed as the Director at Chicago International Charter School Longwood.
3. I was previously employed as Principal at Marshall High School (a Chicago Public School), a school primarily attended by Black students.
4. I was contacted by the CPS Office of the Inspector General (“OIG”) regarding the student attendance records that were reported at Marshall High School from 2012-2014.
5. On October 6, 2016, the CPS OIG issued a report accusing me of falsifying attendance records. CPS then placed a Do Not Hire (“DNH”) on my record affecting my future employment prospects and then contacted my current employer regarding their investigation.
6. CPS and the OIG did not similarly target non-Black administrators or primarily non-Black schools in their investigations.
7. I did not falsify attendance records. I explained to CPS and the OIG that I followed proper attendance procedures at Marshall High School. My work performance was as good, if not better, than non-Black supervisor/administrators of Respondent.
8. I have suffered pecuniary loss and extreme emotional distress as a result of Respondent’s discriminatory treatment of me.

EXHIBIT G



U.S. Department of Justice
Civil Rights Division

NOTICE OF RIGHT TO SUE WITHIN 90 DAYS

CERTIFIED MAIL

7014 3490 0000 6312 2369

950 Pennsylvania Avenue, N.W.

Karen Ferguson, EMP, PHB, Room 4701

Washington, DC 20530

June 16, 2017

Ms. Kenyatta Starks
c/o Barry A. Gomberg, Esquire
Law Office of Barry A. Gomberg & Assocs.
53 W. Jackson Blvd.
Suite 1350
Chicago, IL 60604

Re: EEOC Charge Against City of Chicago, Chicago Board of Education, et al.
No. 21B201700616

Dear Ms. Starks:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

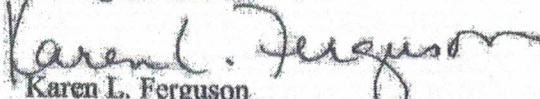
The investigative file pertaining to your case is located in the EEOC Chicago District Office, Chicago, IL.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

T. E. Wheeler, II
Acting Assistant Attorney General
Civil Rights Division

by


Karen L. Ferguson
Supervisory Civil Rights Analyst
Employment Litigation Section

cc: Chicago District Office, EEOC
City of Chicago, Chicago Board of Education, et al.

EXHIBIT H



Office of Employee Engagement
42 West Madison Street, 9th Floor - Chicago, Illinois 60602

October 4, 2016

Kenvatta Stansberry-Butler
[REDACTED]

Dear Ms. Stansberry-Butler:

Please be advised that pursuant to the applicable Chief Executive Officer's Guidelines regarding do not hire ("DNH") status, you are no longer eligible for hire in the Chicago Public Schools and a DNH has been placed on your file. You may petition the Chief Executive Officer to remove that designation. The request should be addressed to Mary Ernesti, 42 West Madison Street, 9th Floor, Chicago, Illinois 60602. Please note that while a petition may be made at any time after placement of the designation, only one petition every two years shall be considered. The Guidelines and procedures for removal of the DNH designation may be found here: cps.edu/oe.

Sincerely,

A handwritten signature in cursive script that reads "Mary Ernesti".

Mary Ernesti
Director of Employee Engagement

ME:cp

cc: James Ciesil
Employee Services

BOE000528

EXHIBIT I

July 11, 2017

**VIA FACSIMILE (312) 553-1622 &
U.S. MAIL**

Andrew Mason, CPS FOIA Officer
Department of Communications
42 W. Madison Street
2nd Floor
Chicago, IL 60602

Re: CPS OIG Freedom of Information Act Request

Dear Mr. Mason:

This is a request under the Freedom of Information Act.

I request that a copy of the following documents be provided to me:

All reports issued by the CPS Office of the Inspector General concerning Kenyatta Stansberry-Butler's (a/k/a Kenyatta Starks) alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.

All documentary evidence that the CPS Office of the Inspector General reviewed and utilized in evaluating Kenyatta Stansberry-Butler's (a/k/a Kenyatta Starks) alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.

All statements obtained by the CPS Office of the Inspector General in their review and evaluation of Kenyatta Stansberry-Butler's (a/k/a Kenyatta Starks) alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.

I look forward to hearing from you regarding the foregoing. Thank you for your consideration of my request. If you are not the proper recipient of this FOIA Request, please advise us of the proper individual to whom this Request should be made.

Very truly yours,

BARRY A. GOMBERG & ASSOCIATES, LTD.


Barry A. Gomberg

BAG/lg

cc: Kenyatta Stansberry-Butler

EXHIBIT J

From: Gomberg Barry <gomberglaw@aol.com>

To: gomberglaw1 <gomberglaw1@aol.com>

Subject: Fwd: Non-Commercial FOIA Request :: N003244-071917

Date: Thu, Jul 20, 2017 11:06 am

BARRY A. GOMBERG & ASSOCIATES, LTD.
53 W. Jackson Blvd. Suite 1350
Chicago, IL 60604
312 922-0550 Office
312 922-0066 Fax
gomberglaw@aol.com Email

-----Original Message-----

From: Chicago Public Schools FOIA Center <cps@mycusthelp.net>

To: gomberglaw <gomberglaw@aol.com>

Sent: Thu, Jul 20, 2017 11:01 am

Subject: Non-Commercial FOIA Request :: N003244-071917

--- Please respond above this line ---

July 20, 2017

Barry A. Gomberg
53 W Jackson
Chicago IL 60604
gomberglaw@aol.com

RE: Chicago Public Schools FOIA Request N003244-071917

Dear Mr. Gomberg:

This letter is in reply to your Freedom of Information Act (FOIA) request seeking the following information:

All reports issued by the CPS Office of the Inspector General concerning Kenyattal Starks' (formerly known as Stansberry-Butler) alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.

All documentary evidence that the CPS Office of the Inspector General reviewed and utilized in evaluating Kenyattal Starks' (formerly known as Stansberry-Butler) alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.

All statements obtained by the CPS Office of the Inspector General in their review and evaluation of Kenyattal Starks' (formerly known as Stansberry-Butler) alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.

RESPONSE: Chicago Public Schools has reviewed your request and determined that the records requested are confidential or exempt from disclosure under the Freedom of Information Act. Pursuant to 5 ILCS 140/7.5(h), "any lawfully created State or local inspector general's office that would be exempt if created or obtained by an Executive Inspector General's office" is exempt from release. In the case of a denial, pursuant to 5 ILCS 140/9.5(a) you may file a Request for Review with the Public Access Counselor (PAC) at: Public Access Counselor; Office of the Attorney General; 500 South 2nd Street; Springfield, IL 62706. You also have the right to seek judicial review of your denial by filing a lawsuit in the State circuit court; 5 ILCS 140/11.

If you have any questions, please contact our office at (773) 553-3500.

9/8/2017

Fwd: Non-Commercial FOIA Request :: N003244-071917

Case: 1:17-cv-06507 Document #: 107-1 Filed: 10/05/18 Page 24 of 35 PageID #: 918

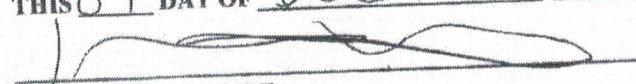

Thank you for Case: 1:17-cv-06507 Document #: 1-1 Filed: 09/08/17 Page 20 of 31 PageID #: 53

Sincerely,

Eric Righi
Freedom of Information Act Assistant
Chicago Public Schools

EXHIBIT K

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974: See Privacy act statement before completing this form. #17W1213.04		AGENCY <input checked="" type="checkbox"/> IDHR <input type="checkbox"/> EEOC	CHARGE NUMBER 2017CF1497
Illinois Department of Human Rights and EEOC			
NAME OF COMPLAINANT (Indicate Mr, Ms, Mrs.) Ms. Angel Johnson		TELEPHONE NUMBER (include area code) (773) 706-8608	
STREET ADDRESS 4141 West 78 th Place		CITY, STATE AND ZIP CODE Chicago, Illinois 60652	DATE OF BIRTH 12 / 30 / 65 M D YEAR
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE LIST BELOW)			
NAME OF RESPONDENT Board of Education of the City of Chicago		NUMBER OF EMPLOYEES, MEMBERS 15+	TELEPHONE NUMBER (include area code) (773) 553-1700
STREET ADDRESS One North Dearborn Street		CITY, STATE AND ZIP CODE Chicago, Illinois 60602	COUNTY Cook
CAUSE OF DISCRIMINATION BASED ON: Race		DATE OF DISCRIMINATION EARLIEST (ADEA/EPA) LATEST (ALL) 10-6-2016 <input type="checkbox"/> CONTINUING ACTION	
THE PARTICULARS OF THE CHARGE ARE AS FOLLOWS:			
<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid black; padding: 5px; transform: rotate(-15deg);"> SEE ATTACHED NOTARIZE </div> <div style="border: 1px solid black; padding: 10px; text-align: center;"> Dept. of Human Rights INTAKE UNIT FEB 01 2017 RECEIVED By: </div> </div>			
I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		SUBSCRIBED AND SWORN TO BEFORE ME THIS <u>31</u> DAY OF <u>Jan.</u> , 2017. NOTARY SIGNATURE	
<div style="border: 1px solid black; padding: 5px; text-align: center;"> "OFFICIAL SEAL" MARTHA HAMILTON Notary Public, State of Illinois My Commission Expires 8/24/2018 </div>		 SIGNATURE OF COMPLAINANT 1 / 31 / 2017 DATE	
NOTARY STAMP		I declare under penalty that the foregoing is true and correct I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief.	

CHARGE OF DISCRIMINATION This form is affected by the Privacy Act of 1974: See Privacy Act Statement before completing this form.		AGENCY <input checked="" type="checkbox"/> IDHR <input checked="" type="checkbox"/> EEOC	CHARGE NUMBER 2017-CF1497
# 17W1213.04 Illinois Department of Human Rights and EEOC			
NAME OF COMPLAINT (indicate Mr. Ms. Mrs.) Ms. Angel Johnson		TELEPHONE NUMBER (include area code) (773) 706-8608	
STREET ADDRESS 4141 West 78th Place	CITY, STATE, ZIP CODE Chicago, Illinois 60652		DATE OF BIRTH
NAMED IS THE EMPLOYER, LABOR ORGANIZATION, EMPLOYMENT AGENCY, APPRENTICESHIP COMMITTEE, STATE OR LOCAL GOVERNMENT AGENCY WHO DISCRIMINATED AGAINST ME (IF MORE THAN ONE, LIST BELOW)			
NAME OF RESPONDENT Chicago Public Schools/Board of Education/Office of Inspector General	NUMBER OF EMPLOYEES, MEMBERS +15	TELEPHONE NUMBER (include area code) (773) 553-1000	
STREET ADDRESS 42 West Madison Street	CITY, STATE, ZIP CODE Chicago, Illinois 60602		COUNTY Cook
CAUSE OF DISCRIMINATION BASED ON: Race discrimination		DATE OF DISCRIMINATION EARLIEST (ADEA/EPA) LATEST (ALL) <input checked="" type="checkbox"/> CONTINUING ACTION	
<div style="text-align: center;"> SEE ATTACHED </div> <div style="text-align: right;"> Dept. of Human Rights INTAKE UNIT DEC 12 2018 RECEIVED By: <i>Pa</i> </div>			
Page 1 of 2 I also want this charge filed with the EEOC. I will advise the agencies if I change my address or telephone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		SUBSCRIBED AND SWORN TO BEFORE ME THIS <u>07</u> DAY OF <u>Dec</u> , 20 <u>16</u>  NOTARY SIGNATURE	
<div style="border: 1px solid black; padding: 5px; text-align: center;"> "OFFICIAL SEAL" MARTHA HAMILTON Notary Public, State of Illinois My Commission Expires 8/24/2018 </div> NOTARY STAMP		 SIGNATURE OF COMPLAINANT <u>12/16/2016</u> DATE I declare under penalty that the foregoing is true and correct I swear or affirm that I have read the above charge and that is true to the best of my knowledge, information and belief	

Ms. Angel Johnson
Charge of Discrimination
Page 2 of 2

I. A. ISSUE/BASIS

Discrimination – May 2016 and ongoing because of my race.

B. PRIMA FACIE ALLEGATIONS

1. I am Black.
2. I am employed as the Assistant Director at Chicago International Charter School Longwood.
3. I was previously employed as Principal at Marshall High School (a Chicago Public School), a school primarily attended by Black students.
4. I was contacted by the CPS Office of the Inspector General ("OIG") regarding the student attendance records that were reported at Marshall High School from 2012-2014.
5. On October 6, 2016, the CPS OIG issued a report accusing me of falsifying attendance records. CPS then placed a Do Not Hire ("DNH") on my record affecting my future employment prospects and then contacted my current employer regarding their investigation.
6. CPS and the OIG did not similarly target non-Black administrators or primarily non-Black schools in their investigations.
7. I did not falsify attendance records. I explained to CPS and the OIG that I followed proper attendance procedures at Marshall High School. My work performance was as good, if not better, than non-Black supervisor/administrators of Respondent.
8. I have suffered pecuniary loss and extreme emotional distress as a result of Respondent's discriminatory treatment of me.

"return this copy"

EXHIBIT L



U.S. Department of Justice
Civil Rights Division

NOTICE OF RIGHT TO SUE WITHIN 90 DAYS

CERTIFIED MAIL

7014 3490 0000 6312 2383

950 Pennsylvania Avenue, N.W.

Karen Ferguson, EMP, PHB, Room 4701

Washington, DC 20530

June 16, 2017

Ms. Angel Johnson
c/o Barry A. Gomberg, Esquire
Law Offices of Barry A. Gomberg & Assocs.
53 W. Jackson Blvd.
Suite 1350
Chicago, IL 60604

Re: EEOC Charge Against Chicago Public Schools, Chicago Board of Education, et al.
No. 21B201700618

Dear Ms. Johnson:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you through your attorney have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice.

The investigative file pertaining to your case is located in the EEOC Chicago District Office, Chicago, IL.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

T. E. Wheeler, II
Acting Assistant Attorney General
Civil Rights Division

by


Karen L. Ferguson

Supervisory Civil Rights Analyst
Employment Litigation Section

cc: Chicago District Office, EEOC

Chicago Public Schools, Chicago Board of Education, et al.

EXHIBIT M

July 11, 2017

**VIA FACSIMILE (312) 553-1622 &
U.S. MAIL**

Andrew Mason, CPS FOIA Officer
Department of Communications
42 W. Madison Street
2nd Floor
Chicago, IL 60602

Re: CPS OIG Freedom of Information Act Request

Dear Mr. Mason:

This is a request under the Freedom of Information Act.

I request that a copy of the following documents be provided to me:

All reports issued by the CPS Office of the Inspector General concerning Angel Johnson's alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.

All documentary evidence that the CPS Office of the Inspector General reviewed and utilized in evaluating Angel Johnson's alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.

All statements obtained by the CPS Office of the Inspector General in their review and evaluation of Angel Johnson's alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.

I look forward to hearing from you regarding the foregoing. Thank you for your consideration of my request. If you are not the proper recipient of this FOIA Request, please advise us of the proper individual to whom this Request should be made.

Very truly yours,

BARRY A. GOMBERG & ASSOCIATES, LTD.

COPY
Barry A. Gomberg

BAG/lg

cc: Angel Johnson

EXHIBIT N

From: Gomberg Barry <gomberglaw@aol.com>
To: gomberglaw1 <gomberglaw1@aol.com>
Subject: Fwd: Non-Commercial FOIA Request :: N003243-071917
Date: Thu, Jul 20, 2017 11:06 am

BARRY A. GOMBERG & ASSOCIATES, LTD.
53 W. Jackson Blvd. Suite 1350
Chicago, IL 60604
312 922-0550 Office
312 922-0066 Fax
gomberglaw@aol.com Email

-----Original Message-----

From: Chicago Public Schools FOIA Center <cps@mycusthelp.net>
To: gomberglaw <gomberglaw@aol.com>
Sent: Thu, Jul 20, 2017 11:03 am
Subject: Non-Commercial FOIA Request :: N003243-071917

--- Please respond above this line ---

July 20, 2017

Barry A. Gomberg
53 W Jackson
Chicago IL 60604
gomberglaw@aol.com

RE: Chicago Public Schools FOIA Request N003243-071917

Dear Mr. Gomberg:

This letter is in reply to your Freedom of Information Act (FOIA) request seeking the following information:

All reports issued by the CPS Office of the Inspector General concerning Angel Johnson's alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.

All documentary evidence that the CPS Office of the Inspector General reviewed and utilized in evaluating Angel Johnson's alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.

All statements obtained by the CPS Office of the Inspector General in their review and evaluation of Angel Johnson's alleged involvement in the alleged falsification of daily attendance records at Chicago Public Schools.

RESPONSE: Chicago Public Schools has reviewed your request and determined that the records requested are confidential or exempt from disclosure under the Freedom of Information Act. Pursuant to 5 ILCS 140/7.5(h), "any lawfully created State or local inspector general's office that would be exempt if created or obtained by an Executive Inspector General's office" is exempt from release. In the case of a denial, pursuant to 5 ILCS 140/9.5(a) you may file a Request for Review with the Public Access Counselor (PAC) at: Public Access Counselor; Office of the Attorney General; 500 South 2nd Street; Springfield, IL 62706. You also have the right to seek judicial review of your denial by filing a lawsuit in the State circuit court; 5 ILCS 140/11.

If you have any questions, please contact our office at (773) 553-3500.

Thank you for your request.

Sincerely,

Annie Righi

Freedom of Information Act Assistant

Chicago Public Schools